REMARKS

Claims 1-3, 5, and 7-9 are presently pending. Claims 4, 6, and 10-13 are cancelled without prejudice.

Claims 1-14 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,310,921 ("Yoshioka").

Claim 1 is amended to recite, among other limitations, "wherein the second state machine loads the memory controller with the second portion while the memory controller fetches the reference pixels".

Examiner has indicated (in the rejection of claim 4) that Yoshioka "teaches the second state machine commands the memory controller to write the second portion, such that the second portion is written to the memory controller while the memory controller fetches the reference pixels. [Col. 11 Lines 39-41; Col. 14 Lines 38-45]". Office Action at 3.

Yoshioka, Col. 11, Lines 39-41 recite "When performing the [Motion Compensation], the routine processing unit 1004 stores the decoded block in the external memory 3 serving as the frame memory via the memory controller 6." Assignee respectfully submits that although Yoshioka teaches "stores the decoded block … via the memory controller 6", there is no teaching that the foregoing occurs "while the memory controller fetches the reference pixels".

Yoshioka, Col. 14, Lines 38-45 recites:

> More specifically, for P-pictures or B-Pictures the pixel read/write unit 11 extracts a rectangle area indicated by the motion vector from the decoded reference frame in the external memory 3 via the memory controller 6 and blends the rectangle area with the block processed by the pixel calculation unit 10 to obtain an

original block image. The decode result given by
the pixel read/write unit 11 here is stored in
the external memory 3 via the memory controller
6.

Although the foregoing teaches that "the pixel
read/write unit 11 extracts a rectangle area" and "The
decode result given by the pixel read/write unit 11 here is
stored in the external memory 3 via the memory controller
6", there is no teaching that "the pixel read/write unit 11
extracts a rectangle area" occurs while "The decode result
given by the pixel read/write unit 11 here is stored in the
external memory 3 via the memory controller 6".

Moreover, since the "decode result" is obtained when
"pixel read/write unit 11" "blends the rectangle area with
the block processed by the pixel calculation unit 10", the
"decode result" cannot be "written to the memory controller
while the memory controller fetches" the "rectangle area".

Accordingly, Assignee respectfully traverses the
rejection to claim 1 and requests that Examiner withdraw
the rejection to claim 1, as well as dependent claims 2 and
3.

Claim 5 is amended to recite, among other limitations
"a memory controller for fetching the reference pixels
after the first state machine issues the command, and
writing the second portion of the picture after the second
state machine issues the command, and wherein the memory
controller loads the second portion of the picture while
fetching the reference pixels".

Examiner has indicated (in rejecting claim 6) that
Yoshioka teaches "wherein the memory controller loads the
second portion of the picture while fetching the reference
pixels [Col. 15 Line 65 – Col. 16 Line 2; Fig. 15 (A&B);

Col. 23, Lines 62-67]". Although the foregoing recite, "pipeline processing", for anticipation "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989)." MPEP 2131. It is respectfully submitted that the foregoing does not teach or fairly suggest "wherein the memory controller loads the second portion of the picture while fetching the reference pixels".

Accordingly, Assignee respectfully traverses the rejection and requests that Examiner withdraw the rejection to claim 5, and dependent claims 7-9.

Claim 10 is amended to recite, among other limitations, "loading the second portion of the picture while fetching the reference pixels". Examiner has indicated (in the rejection of claim 13) that Yoshioka teaches "loading the second portion of the picture while fetching the reference pixels"

CONCLUSION

For at least the foregoing reasons, Assignee respectfully submits that each of the pending claims are allowable and Examiner is respectfully requested to pass this case to issuance. The Commissioner is hereby authorized to charge additional fees or credit overpayments to the deposit account of McAndrews, Held & Malloy, Account No. 13-0017.

Dated: January 4, 2008   Respectfully submitted,

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